

**ATTACHMENT A**

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT**

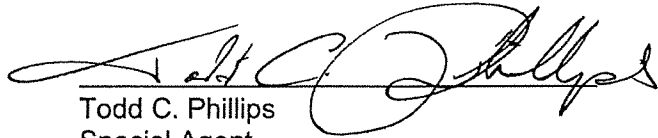
I, Todd C. Phillips, Special Agent, U.S. Postal Service, Office of Inspector General, being duly sworn, depose, and state the following:

1. I am a Special Agent with the United States Postal Service, Office of Inspector General (USPS-OIG) and have been since September 2012. Your affiant is currently assigned to the Mid-Atlantic Area Field Office – Roanoke Sub-Office. I have participated in numerous investigations including narcotics trafficking, mail theft, and financial fraud. I have also attended training at the Federal Law Enforcement Training Center.
2. Your affiant knows based on training and experience that the U.S. Mail is often used by drug traffickers and drug trafficking organizations to transport controlled substances. Your affiant knows based on training and experience that U.S. Postal Service (USPS) Priority Mail and Priority Mail Express are commonly used to transport controlled substances because drug traffickers can track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.
3. This affidavit is submitted in support of an application for a search warrant of USPS Priority Mail parcel bearing tracking numbers “9505 5066 8586 3104 3662 44” for controlled and/or illegal substances. The parcel is described as follows:  
Parcel #1:
  - A. Addressee: “Christina Simmons, 590 Switchgrass Ct, Bunker Hill, WV 25413”
  - B. Return Address: “Genesis Healthcare, 11552 Knott St, Garden Grove, CA 92841”
  - C. Postage Affixed: Priority Mail, Origin: 90630, Postage: \$57.65, Date: April 14, 2023
  - D. Tracking Number: 9505 5066 8586 3104 3662 44 (hereafter referred to as Parcel #1)
  - E. Description: Brown cardboard box with brown tape. Weighs approximately 7 pounds 10 ounces.
4. On April 16, 2023, your affiant identified Parcel #1 during routine parcel interdiction. On April 17, 2023, your affiant intercepted Parcel #1 at the Martinsburg, WV Post Office. Your affiant transported Parcel #1 to the Eastern Panhandle Drug and Violent Crimes Task Force office. Parcel #1 is brown cardboard box with brown tape bearing printed

labels. Parcel #1 was mailed from Cypress, CA 90630, a known source area for controlled substances shipped via the USPS into the Northern District of West Virginia. A photograph of Parcel #1 is attached as Exhibit #1.

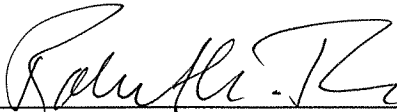
5. Your affiant made inquiries via Accurint, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information. The name of the addressee, "Christina Simmons" was unable to be associated as a current resident with the destination address "590 Switchgrass Ct, Bunker Hill, WV 25413." The return name, "Genesis Healthcare" was able to be associated with the return address "11552 Knott St, Garden Grove, CA 92841" when searched on Google Maps. Based on your affiant's training and experience, drug traffickers will often use fictitious name and address information when mailing parcels containing controlled substances to conceal the sender's and/or recipient's identity while ensuring parcels are delivered correctly.
6. On April 17, 2023, your affiant requested a narcotic detection canine from the West Virginia State Police. Senior Trooper B.F. Gorondy, and his narcotic detection canine "Dak," responded to the Martinsburg Post Office located at 1355 Old Courthouse Square Martinsburg WV. Parcel #1 was placed in a blind parcel line-up and subjected to an exterior free air sniff by canine "Dak". Senior Trooper B.F. Gorondy advised your affiant that canine "Dak" positively alerted to Parcel #1 at approximately 12:45 PM. According to Senior Trooper B.F. Gorondy, K9 "Dak" gave a positive alert to the presence of a narcotic odor emanating from suspect Parcel #1.
7. At this time, Parcel #1 is located at the Eastern Panhandle Drug and Violent Crimes Task Force office in the Northern District of West Virginia. The parcel has been maintained unopened pending application for a search warrant.
8. Based on the information contained herein, your affiant maintains there is probable cause to believe that U.S. Postal Service Priority Mail parcel "9505 5066 8586 3104 3662 44," addressed to "Christina Simmons, 590 Switchgrass Ct, Bunker Hill, WV 25413," bearing a return address of "Genesis Healthcare, 11552 Knott St, Garden Grove, CA 92841," contain controlled substances, and/or proceeds which are evidence

thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).



Todd C. Phillips  
Special Agent  
U.S. Postal Service Office of Inspector General

Subscribed and sworn to before me this 17<sup>th</sup> day of April, 2023.



The Honorable Robert W. Trumble  
United States Magistrate Judge  
Northern District of West Virginia